

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

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MDL NO. MD-15-02641-PHX-DGC
CIVIL ACTION NO. 2:18-cv-04774

Robin Morgan v. C.R. Bard, Inc. et al.

MOTION

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Plaintiff, Robin Morgan, by and through her attorneys respectfully seeks leave of Court to file an Amended Short Form Complaint in this matter for the reasons set forth below:

1. The lawsuit was directly filed in this MDL on December 19, 2018. In her filed Short Form Complaint, Plaintiff inadvertently failed to include the transferor venue. Plaintiff also seeks to amend the pleadings to no longer include C. R. Bard, Inc. as named-defendant.

2. Under Federal Rule of Civil Procedure 15(a), leave of court to amend a petition should be freely given when justice so requires. No party will be prejudiced by this change. It is hereby requested that this Motion for Leave to File Amended Short Form Complaint be granted.

Dated: January 8, 2020

MCSWEENEY/LANGEVIN

/s/ David M. Langevin
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